

# EXHIBIT A

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**From:** Andrew S. Bruns  
**Sent:** Monday, June 14, 2021 12:46 PM  
**To:** Ercolini, Michael  
**Cc:** Anna Porto; wgs-singularv.google@wolfgreenfield.com; kvp-singular; abhansali@kblfirm.com; nspeed@wolfgreenfield.com  
**Subject:** RE: Motion for Expedited Briefing  
**Attachments:** RE: Activity in Case 1:19-cv-12551-FDS Singular Computing LLC v. Google LLC Order

Michael,

Given the limited notice, we are not available for a call before 4pm EST today, as you've requested, but welcome the opportunity to meet and confer later this week.

As I noted in my emails to you on June 1 and June 7 (attached here for your reference), the issues Singular has now raised via email have never been the subject of good faith meet and confer efforts as required by both Federal Rule of Civil Procedure 30(b)(6) and Local Rule 37.1. You did not raise them when we spoke on the phone on May 14 and you have repeatedly refused to engage with Google's subsequent meet and confer requests. For these reasons, any motion to compel on these issues remains premature at this time. Singular's proposal to expedite briefing is all the more inappropriate given the record here.

Pursuant to Local Rule 37.1(a), today is the last day for Singular to respond to Google's most recent request to meet and confer contained in my June 7 email, to which you have never responded. The parties appeared to make significant progress in narrowing any areas of disagreement related to Singular's Rule 30(b)(6) notice during our May 14 call. We continue to believe that the most expeditious path to resolving any remaining disputes is via meet and confer, rather than unnecessary and premature motion practice.

Please provide dates late this week for the parties to meet and confer regarding Singular's Rule 30(b)(6) notice.

Best,  
Andy

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**Andrew Bruns**

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*Pronouns: he/him/his*

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**From:** Ercolini, Michael <mercolini@princelobel.com>  
**Sent:** Monday, June 14, 2021 9:29 AM  
**To:** Andrew S. Bruns <ABruns@keker.com>  
**Cc:** Anna Porto <APorto@keker.com>; wgs-singularv.google@wolfgreenfield.com; kvp-singular

<kvpsingular@keker.com>; abhansali@kblfirm.com; nspeed@wolfgreenfield.com

**Subject:** Re: Motion for Expedited Briefing

[EXTERNAL]

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Counsel,

As an addendum to the below email, we will file our motion by 5 pm EST today, so if Google opposes the motion for expedited briefing, please let us know a time for the meet and confer before 4 pm EST today. If Google does not oppose, please confirm by or before 4 pm EST today.

Best regards,

**Michael Ercolini**  
**Prince Lobel Tye LLP**  
d: (617) 456-8084  
m: (617) 775 1489

On Jun 14, 2021, at 12:24 PM, Ercolini, Michael <[mercolini@princelobel.com](mailto:mercolini@princelobel.com)> wrote:

Counsel,

In light of the impending discovery deadline, we intend to seek expedited briefing on our motion to compel testimony as to our noticed 30(b)(6) topics. Specifically, we would like the response to fall due on Monday, June 21st, with a reply, if any, to fall due on June 24th. Please let us know if Google opposes the request. If Google opposes, please let us know a time today when you would be available to meet and confer on this.

Thank you,

**Michael Ercolini**  
**Prince Lobel Tye LLP**  
d: (617) 456-8084  
m: (617) 775 1489

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